ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)

Compliance Evaluation Inspection (CEI) Report

1) Author of Report

Bailee Dykes
Environmental Scientist
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

United Plating – Stanwood Boulevard Facility (United Plating-Stanwood)
3400 Stanwood Boulevard
Huntsville, (Madison County), Alabama 35811

EPA ID Number: ALD067111450
NAICS Code(s): 332813, 332812
Website: [HYPERLINK "http://www.UnitedPlating.com"]

3) Responsible Official(s)

Mr. James Butler – Controller
Telephone: 256-319-4206
Email: [HYPERLINK "mailto:jbutler@unitedplating.com"]

4) Inspection Participant(s)

Mr. James Butler – United Plating – Stanwood
Mrs. Deborah Jones – Senior Environmental Engineer for United Plating – Stanwood
Mrs. Sarah Yeldell – Project Manager for United Plating – Stanwood
Ms. Paula Whiting – U.S. Environmental Protection Agency
Ms. Bailee Dykes – ADEM

5) Date of Inspection

March 15, 2017

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

ADEM

7) **Purpose of Inspection**

The purpose of this inspection was to determine compliance with all applicable requirements of the Hazardous Waste Program regulations.

8) **Facility History & Description**

United Plating – Stanwood, a division of United Plating, Inc. occupies 175,000 square foot facility where it provides metal finishing services for the automotive, aerospace, military, medical, industrial, and the telecommunications industry. United Plating – Stanwood's hours of operation are 6:00 a.m. to 2:30 p.m. for the production area. United Plating – Stanwood employs 85 people; two of whom have assigned jobs related to hazardous waste management. The facility last submitted a *Notification of Regulated Waste Activity* form (ADEM Form 8700-12, received by the Department on April 19, 2016) identifying itself as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

United Plating – Stanwood metal finishing services consist of electrolytic nickel, electroless nickel, phosphate, and anodized plating and paint operations. The plating wastewaters are treated in a wastewater treatment unit (WWTU) permitted for indirect discharge by ADEM's Water Division. The treated wastewater is discharged to the City of Huntsville Publicly Owned Treatment Works. The filter cake is discharged directly from the WWTU filter press into a 55-gallon drum. The painting operations generate waste paint thinner and paint sludge. Paint waste from painting operations accounts for most of the remainder of the hazardous waste generated.

9) **Observations**

At approximately 2:30 p.m. a representative of the U.S. Environmental Protection Agency (Ms. Whiting), and I hereinafter "we" or "us" arrived at the facility and were greeted by Mr. Butler. During the opening conference, we identified ourselves and explained the purpose of the inspection. According to Mr. Butler, the facility generates the following hazardous wastes: paint waste from the facility's two paint booth operations, paint booth filters, and wastewater treatment of electroplating operations. Universal waste from spent fluorescent lamps. Following the opening conference, Mr. Butler guided us on a walk-through inspection of the facility, noting the following areas:

Building #2 – Painting Operations (Satellite Accumulation Area)

First, Mr. Butler escorted us to Building #2 that consists of a paint shop, two paint booths, a solvent reclamation still, and an adjacent satellite accumulation building. In this area, we observed two trash cans that contained discarded wet paint containers and another trash can that contained discarded wet paint filters from the paint booths (see Photographs #1 through #3). In this area we also observed a Chemchamp solvent still and a Herkules Automatic Paint Gun Washer (see Photograph #4). Next to the solvent still, we observed two 5-gallon containers of Spent/Lacquer Thinner to be recycled. The containers each had a lid, but the lids were not

securely closed (see Photograph #5). Next, we were escorted to an adjacent building designated for the satellite accumulation point from the paint booth area. The building was locked and had signage bearing the words "Danger – Unauthorized Personnel Keep Out". In this area, we observed one 55-gallon drum designated for solvent wipes and one 55-gallon drum designated for paint waste (see Photographs #6 and #7). The drum containing the solvent wipes was labeled with the words "Hazardous Waste", closed, and marked with "D001, F003, and F005" hazardous waste codes.

Building #1 (Satellite Accumulation Areas, Shipping/Receiving, and Universal Waste Storage)

Next, Mr. Butler escorted us to Building #1 where two consultants for United Plating - Stanwood, Mrs. Jones and Mrs. Yeldell, joined us for the inspection. Building #1 houses another paint line operation that consists of two paint booths. Near the paint booth area, we observed one 55-gallon satellite accumulation drum designated for solvent wipes. The 55-gallon drum was closed, labeled with the words "Hazardous Waste" and marked with "D001, F003, F005" hazardous waste codes (see Photograph #8). Also near the paint booth area, we observed a spill pallet with various containers staged on it. One 5-gallon container was observed having an unknown brown liquid inside (see Photograph #9). Next, we were escorted to the plating lines in Building #1. The facility has four electroplating lines: anodized, electrolytic nickel, electroless nickel, and phosphate. No areas of concern were noted with these electroplating lines. In an adjacent, the facility also has a Boeing research line. In the Boeing research line area, we observed one 55-gallon satellite accumulation drum designated for plating filters. The drum was labeled with the words "Hazardous Waste" and marked with "D007 and F006" hazardous waste codes, but not closed (see Photograph #10).

Next, we were escorted to the Shipping/Receiving Area of Building #1. In this area, we observed two 55-gallon drums of an unknown material (see Photograph #11). No other areas of concern were noted in the Shipping/Receiving Area.

Next, we were escorted to the Universal Waste Storage Area located in Building #1. The universal waste storage area consists of a small storage shed with signage bearing the words "Universal Waste Storage Area – Unauthorized Persons Keep Out" (see Photograph #12). Inside the shed, we observed one 8ft cardboard box, one 4ft cardboard box, one small square cardboard box of used fluorescent bulbs, and one 1.25 gallon container of alkaline/nickel batteries (see Photograph #13). The 8ft box of used fluorescent lamps were marked with an accumulation start date of "9/8/16", the 6ft box marked with an accumulation start date of "7/6/16", and the small square cardboard box marked with an accumulation start date of "7/6/16". The 1.25 gallon container of used batteries were marked with an accumulation start date of "5/23/16". All of the boxes and the container were closed and labeled with the words "Universal Waste". No areas of concern were noted in the universal waste storage area.

Building #3 Wastewater Treatment System

Next, Mr. Butler escorted us to the Wastewater Treatment System in Building #3. In this area, filter press sludge from the wastewater treatment system is collected. According to Mr. Butler,

the process generates six to eight drums on a monthly basis dependent upon production needs. At the time of the inspection, there was no waste being generated from the filter press. No areas of concern were noted in this area.

90-Day Hazardous Waste Container Storage Area

Next, Mr. Butler escorted us to the 90-Day Hazardous Waste Container Storage Area. In this area, we observed four 55-gallon drums of hazardous waste, one Gaylord box of paint filters, and one Super-sack of plating filters (see Photographs #14 and #15). Two of the 55-gallon drums were marked with "2/6/17" for an accumulation start date and hazardous waste codes "F006 and F019", closed, and labeled with the words "Hazardous Waste". The remaining two 55-gallon drums were marked with "3/7/17" for an accumulation start date and hazardous waste codes "F006 and F019", closed, and labeled with the words "Hazardous Waste". The Gaylord box containing paint filters was marked with "1/26/17" for an accumulation start date and hazardous waste codes "D001, F003, and F005", closed, and labeled with the words "Hazardous Waste". The Super-sack containing plating filters was marked with "1/4/17" for an accumulation start date and hazardous waste codes "D007 and D007" and labeled with the words "Hazardous Waste". The Super-sack was not closed in the 90-day Hazardous Waste Storage Area (see Photograph #16). The following items were present: a secondary containment system; appropriate signage alerting personnel to the possible presence of hazardous waste (e.g., "Hazardous Waste", "No Smoking", and "Danger – Unauthorized Personnel Keep Out"); spill response equipment; and a physical security system (e.g., locked doors) to minimize or prevent the unknowing or unauthorized entry of personnel into the area.

Building #4

Next, Mr. Butler escorted us to Building #4. According to Mr. Butler, the building use to house a plating line. No hazardous waste or any kind of activity is currently taking place in this building. The building is currently being refurbished. No areas of concern were noted.

Welding Shop Storage

Last, Mr. Butler escorted us to the Welding Shop Storage area. In this area, we observed two 8ft spent fluorescent lamps staged in a corner not containerized, dated, or labeled (see Photograph #17). No other areas of concern were noted in the Welding Shop Storage.

Records Review

After the walk-through inspection of the facility, we asked to review the following documents required by Division 14 of the ADEM Administrative Code:

- Hazardous waste shipping manifests for the last three years
- Weekly inspection logs of hazardous waste storage areas
- Training records of employees who manage hazardous waste

- Contingency Plan
- Documentation of arrangements with local emergency responders
- Waste Minimization Plan

After a review of documents, the following items were noted:

- Hazardous wastes (D001, F003, and F005) are picked up by Homeland Environmental Solutions, LLC (ALR000048870) and sent to Clean Earth of Alabama (ALD981020894) Tradebe for storage treatment;
- Hazardous wastes (F006, F019, and D002) are picked up by Chemical Waste Management, Inc. (ALD000622464) and Robbie D. Wood (ALD067138891) and are sent to Chemical Waste Management, Inc. (ALD000622464) for storage/treatment;
- Hazardous wastes (D002 and D007) are picked up by Vickery Transportation, Inc. (OHR000103762) and sent to Vickery Environmental, Inc. (OHD020273819) for storage/treatment;
- Universal wastes are transported by and sent to Environmental Solutions, LLC (ALR000046870);
- Weekly inspection logs of the hazardous waste storage area were not conducted from 1/3/17 to 1/23/17;
- No annual hazardous waste management training was conducted for the required staff in 2016; and
- Waste Minimization Plan needs to be updated to include current process lines and manifest logs.

Summary

This inspection was performed to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code. During the inspection, the following areas of concern or potential noncompliance were noted:

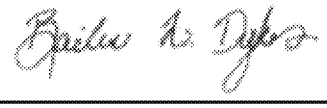
- Three trash cans staged in Building #2 were observed containing wet paint containers and used paint filters;
- Two 5-gallon containers of Spent/Lacquer Thinner to be recycled were staged in Building #2 were not closed;
- One 5-gallon container staged in Building #1 was observed open and contained an unknown material;
- One 55-gallon satellite accumulation drum staged near the Boeing Research Line was not closed;
- Two 55-gallon drums of an unknown material was observed in the Shipping/Receiving Area of Building #1;
- One Super-sack of plating filters staged in the 90-day Hazardous Waste Storage Area was observed open;
- Two 8ft spent fluorescent lamps were staged in the Welding Shop Storage Area not in a

contained, dated, or labeled;

- Weekly inspections of the hazardous waste storage area were not conducted from 1/3/17 to 1/23/17;
- No annual hazardous waste management training was conducted for the required staff in 2016; and
- Waste Minimization Plan needs to be updated to include current process lines and manifest logs.

Following the walk-through inspection, we discussed our observations with Mr. Butler. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report*, indicating observations noted during the time of inspection. Mr. Butler reviewed, signed, and accepted the report on behalf of United Plating - Stanwood. We concluded the closing conference and departed the site at approximately 6:00 p.m.

10) Signed



Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

04/04/2017
Date

11) Concurrence

Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

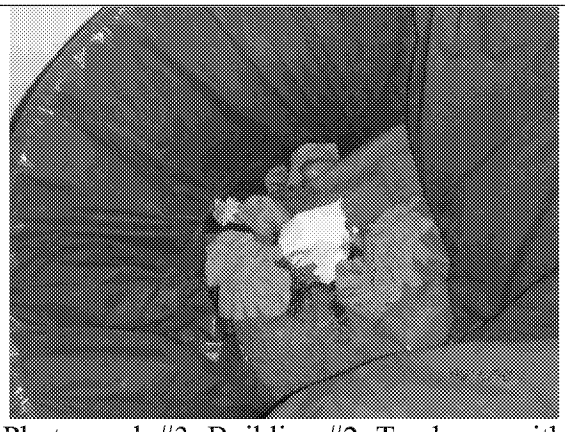
04/04/2017
Date

ADEM

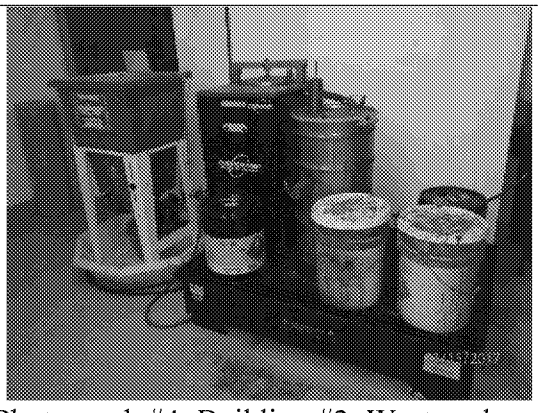
PHOTO LOG

Photograph #1: Building #2: Trash can with discarded wet paint

Photograph #2: Building #2: Trash can with discarded wet paint

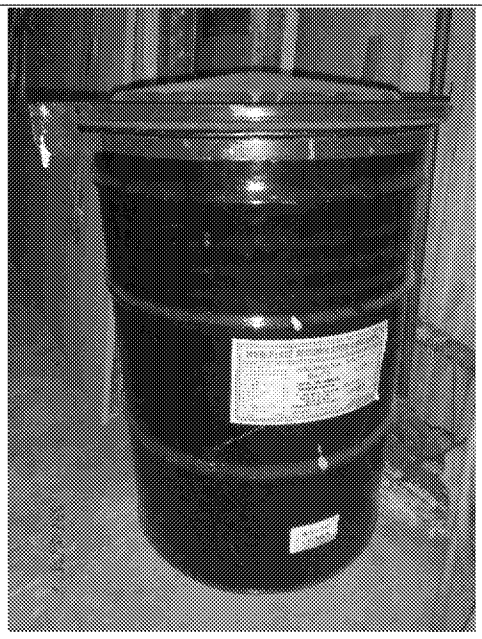


Photograph #3: Building #2: Trash can with discarded paint filter

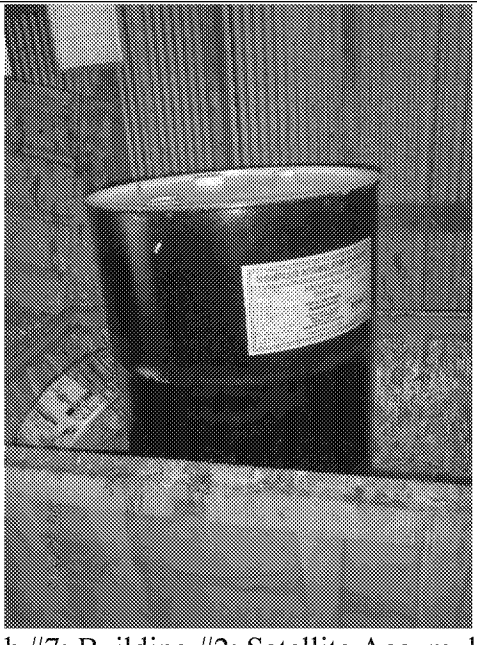


Photograph #4: Building #2: Waste solvent containers, solvent still, and paint gun washer

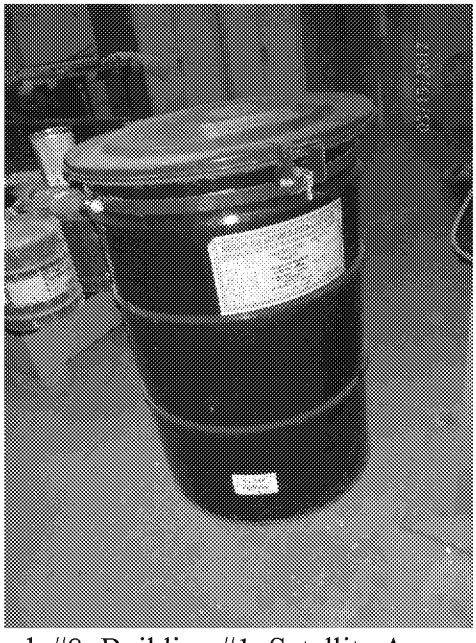
Photograph #5: Building #2: Waste solvent containers



Photograph #6: Building #2: Satellite Accumulation Container for solvent wipes

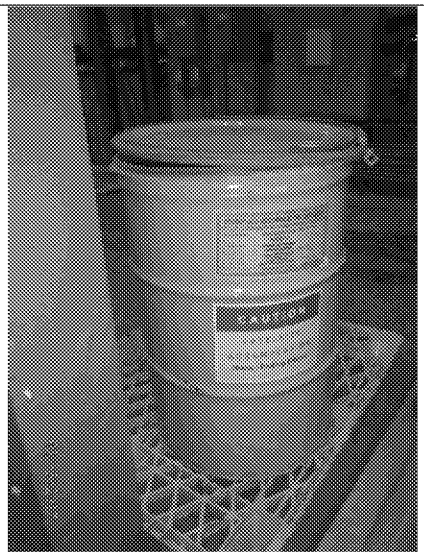


Photograph #7: Building #2: Satellite Accumulation Container for paint waste

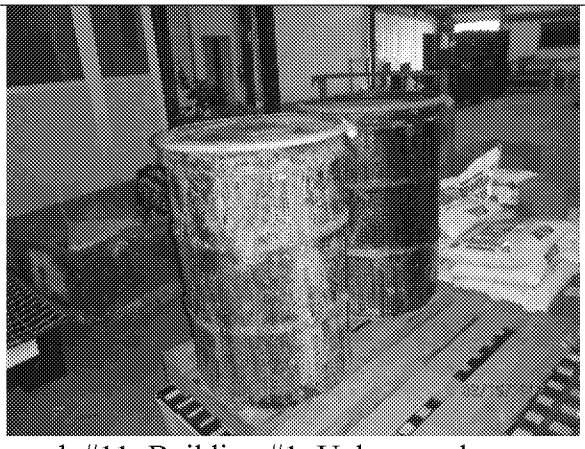


Photograph #8: Building #1: Satellite Accumulation Container for solvent wipes

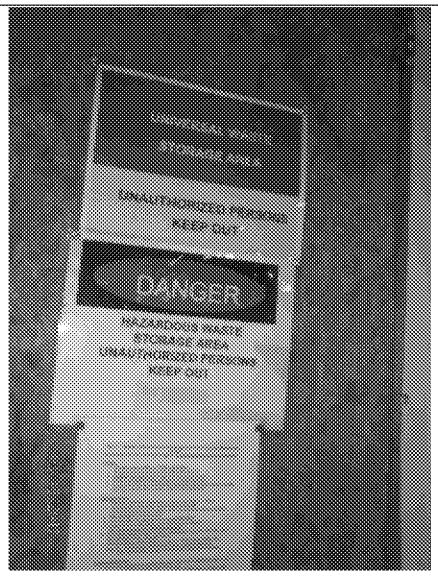
Photograph #9: Building #1: Container of unknown brown liquid



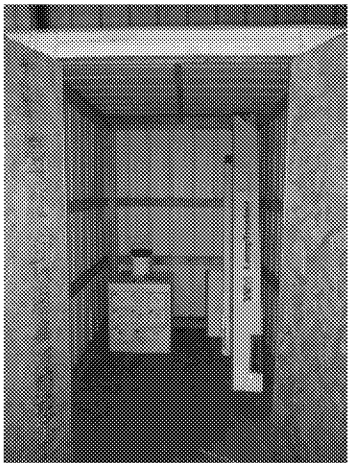
Photograph #10: Building #1: Satellite Accumulation Container for plating filters stage at the Boeing Research Line



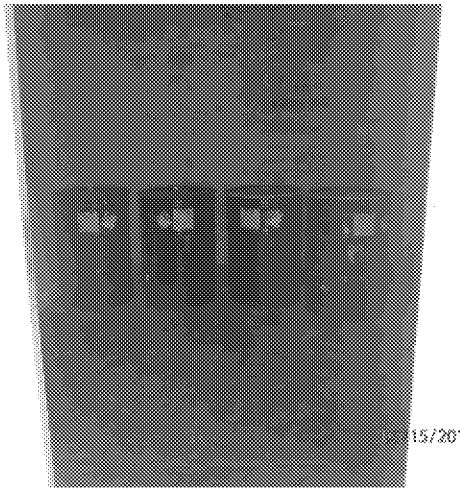
Photograph #11: Building #1: Unknown drums staged in Shipping/Receiving Area



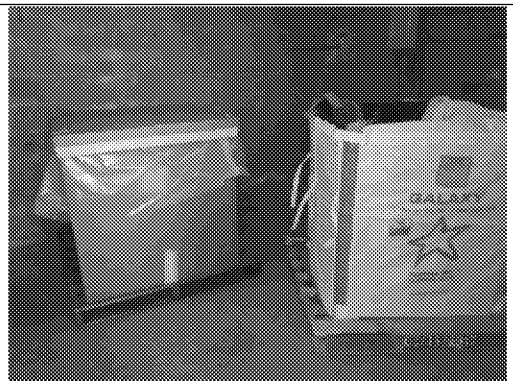
Photograph #12: Building #1: Universal Waste Storage Area



Photograph #13: Building #1: Universal Waste Storage Area

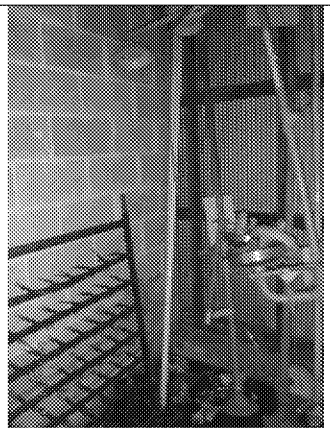


Photograph #14: 90-day Hazardous Waste Storage Area



Photograph #15: 90-day Hazardous Waste Storage Area

Photograph #16: 90-day Hazardous Waste Storage Area open super-sack



Photograph #17: Welding Supply Storage Area: Two universal waste lamps not contained, dated, or labeled